

October 7, 2021

Los Angeles City Clerk
200 North Spring Street, Room 395, City Hall
Los Angeles, California 90012

VIA FEDERAL EXPRESS

NOTICE OF CLAIM AND INTENT TO SUE FOR MONEY DAMAGES

Pursuant to Govt. Code §910 *etc.*, please take notice of the following claim presented on behalf of each of the 871 Los Angeles City employees listed in Appendix A (“Firefighters”). The claim of each Claimant arises out of a common set of facts, widely known within Los Angeles Fire Department (“LAFD”), regarding LAFD’s direct order that Firefighters take a Covid vaccination—or lose their jobs, without the benefit of *Skelly* due process rights.

(a) *Name and Address of Claimant:* each Claimant is listed individually on Appendix A. Each Claimant’s address is known to Los Angeles City (“City”) since each Claimant is currently employed by the City.

All communication to each Claimant should be directed to Claimants’ attorney, identified below. Claimants’ attorney will respond to all investigative inquiries on behalf of each Claimant.

The appendix lists each person by name and provides space for the City to add a claim number next to each name. While claims would ordinarily be presented individually, we suggest that this consolidated claim is the most convenient method for investigation and review, and therefore constitutes substantial compliance. If you disagree, please contact the undersigned as soon as possible and we will submit each claim separately.

(b) *Address of Claimant’s Representative:* Each claimant is represented by Kevin McBride and McBride Law PC, whose address is 700 S. Flower Street, Suite 1000, Los Angeles, CA 90017. All notices to each claimant should be sent to Kevin McBride at this address.

(c) Names Of The Public Employees and Entity Causing the Injury, Damage, or Loss, to the Extent Known:

--Los Angeles Fire Department ("LAFD")
--Fire Chief Ralph Terrazas
--Battalion Chief Jamie Lesinski
--Battalion Chef Nick Ferrari
--Battalion Chief Vince Alvarado

Collectively, the LAFD chiefs listed above are sometimes referred to herein as "Chiefs."

(d) General Description of Wrongful Conduct, together with Injury, Damage and Loss:

At multiple times and places, in writing and through in-person communication to Claimants from Sept. 23, 2021 to the present, LAFD and one or more of the Chiefs imparted a direct order to Claimants, in sum and substance that:

*October 20, 2021 is a hard deadline for Claimants to receive a Covid vaccine; and that anyone who is not fully vaccinated by October 20 will be sent home for 5 days, **without pay**; that Claimants will then have a reconsideration period, **without pay** to get vaccinated; and that if a Claimant is still not vaccinated after another 5 days, Claimants' employment will be terminated.* (hereafter, the "Chiefs' Covid Vaccination Order").

The Chiefs' Covid Vaccination Order is blatantly wrongful conduct, for at least the following reasons:

→ **Interference with Employment Rights**

Summary

For the reasons explained hereafter¹, no disciplinary action may be taken against any Claimant with respect to Covid vaccination status unless and until the following steps are completed: first, an impasse is declared in collective bargaining between the City and UFLAC concerning Covid vaccination status as a condition of employment; second, arbitration is concluded between UFLAC and the City as a result of impasse; and third, each Claimant has been afforded *Skelly* due process rights.

Further, insofar as each individual Claimant is concerned, no Claimant can be sent home without pay unless and until *Skelly* rights are fully and finally adjudicated for that Claimant.

¹ See, Discussion of Employment Rights Under Govt Code §3503 and §3504 at p. 3, *infra*

On information and belief, LAFD and the Chiefs all know this process and the legal requirements of *Skelly*. Nevertheless, they intentionally or negligently ignore Claimants rights under collective bargaining and under *Skelly*, with the goal to intimidate, frighten, coerce and force Claimants into taking a Covid vaccine before the Oct 20 date, even though *Oct 20, 2021 is not, and cannot be, a meaningful date of enforcement because of the collective bargaining process and Skelly hearing process*—and the Chiefs know this.

On information and belief, pending discovery, the Chiefs' conduct, and that of LAFD, can only have been intended to intimidate, frighten, coerce and force Claimants to receive a Covid shot before Oct 20.

In addition, on information and belief, LAFD and Chief Terrazas have engaged in an active media campaign to slander non-vaccinated Firefighters, including Claimants, to the citizens of Los Angeles, based on Claimants' Covid vaccination status. This media campaign by LAFD has increased the stress level of Claimants to an unimaginable and intolerable degree.

This wrongful conduct of the Chiefs and LAFD violates Claimants' rights set forth hereafter.

Discussion of Employment Rights Under Govt Code §3502 and §3503

Claimants are members of United Firefighters of Los Angeles ("UFLAC") and are entitled to all employment protections of the Memorandum of Understanding ("MOU") that exists between the City and UFLAC covering the period July 1, 2019 to June 30, 2022.

Claimants are individual beneficiaries of the MOU and have the right to expect City to collectively bargain in good faith with UFLAC on the Covid vaccine mandate issue. And while UFLAC is the recognized bargaining agent, Claimants nevertheless also have the right to appear in their own behalf in employment relations with the City pursuant to Govt. Code §3502.

The Covid vaccination mandate asserted by the City is a new *proposed* condition of employment that is beyond the scope of the existing MOU. The City is therefore required to collectively bargain with UFLAC under Govt. Code §3504 with respect to this proposed condition of employment—the City cannot unilaterally impose this condition. Indeed, on information and belief, such collective bargaining is ongoing. The collective bargaining process requires multiple steps before disciplinary action may be taken. Bargaining must continue in good faith until an impasse is declared, after which the matter is referred to arbitration. Until this process is concluded, Claimants have the protection of the existing MOU, which does not require a Covid vaccine as a condition of employment. LAFD cannot run roughshod over these protections; though that is exactly what it is doing.

If disciplinary steps are taken against individual Claimants with respect to a condition of employment that doesn't exist in the current MOU, each Claimant is then entitled to due process and a hearing, pursuant to *Skelly v. State Personnel Bd.*, 15 Cal.3d 194, 124 Cal.Rptr. 14, 539 P.2d 774 (Cal. 1975) ("when a person has a legally enforceable right to receive a government benefit provided certain facts exist, this right constitutes a property interest protected by due process.")

No termination process may be initiated against Claimants to interfere with each Claimant's property rights in government benefits unless and until *Skelly* rights are concluded. Quite obviously, the bargaining process and arbitration and *Skelly* hearings cannot be concluded for any Claimant until long after October 20, 2021. Therefore, the asserted October 20 deadline for Claimants to get vaccinated is false and unenforceable. Most egregiously, the threat that Claimants will be sent home *without pay*, is in complete disregard of the rule of *Skelly*, handed down by the California Supreme Court.

→ **Infliction of Emotional Distress**

On information and belief, The Chiefs' Covid Vaccine Order was intentionally or negligently designed and intended to cause severe emotional distress to Claimants by threatening Claimants with an artificial and unenforceable deadline to frighten Claimants into taking an unwanted Covid vaccine.

This conduct by the Chiefs and LAFD was extreme and outrageous and in reckless disregard of the probability of causing emotional distress to Claimants—which has, in fact occurred.

Claimants and each of them have suffered severe and extreme emotional distress as a result of the wrongful Chiefs' Covid Vaccine Order, to the point that many Claimants are on the verge of going "off stress," pursuant to Department policies.

To make matters worse, if that were even possible, the Department is now setting citizens of the City of Los Angeles against Claimants and other unvaccinated firefighters through media and public relations campaigns, creating fear and confusion in the general public. Consequently, Claimants now suffer indignities and viperous comments when responding to emergency calls, which compounds and increases the stress suffered by Claimants.

This wrongful conduct of the Chiefs and LAFD addressed in this Notice is the actual and proximate causation of Claimants' emotional distress; further this wrongful conduct is so extreme that it exceeds all bounds of behavior by a fire department and fire chiefs customarily tolerated in a public employment setting governed by a collective bargaining agreement.

Claimants are therefore entitled to an award of damages against LAFD and the Chiefs, jointly, at common law.

→ **Violation of Constitutional Privacy Rights**

The California Constitution, section I, article 1, provides that “[a]ll people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety, happiness, and privacy.”

The fundamental right to pursue and obtain safety, happiness, and privacy, as expressed through public policies of this State, is protected against all state action.

The right of individuals to determine what is done to their own bodies is one such expressed public policy of this State; and is an inalienable autonomy privacy right protected under the California Constitution and at common law.

In addition, the right to exercise informed consent to accept, or not accept, novel and unproven medical treatments without force, fraud, deceit, duress, coercion, or undue influence is another expressed public policy of this State; and is an inalienable autonomy privacy right protected under the California Constitution, section I, article 1; and at common law.

LAFD and the Chiefs are engaging in conduct designed to subvert Claimants’ constitution rights to decide what experimental medicine goes into their own bodies, and to accept, or not accept, novel and unproven medical treatments without force, fraud, deceit, duress, coercion, or undue influence. Such conduct is wrongful and entitles Claimants to an award of damages under Constitution section I, article 1 and at common law.

→ **Violation of Protection of Human Subjects in Medical Experimentation Act**

H&S Code §24172 provides an “experimental subject’s bill of rights,” which is a list of the rights of a subject in a medical experiment. The Covid vaccines being forced on Claimants by LAFD and the Chiefs are without question experimental medicine, unproven and not approved by any authoritative agency. Further, H&S Code 24175 provides the requirement for informed consent before any person receives experimental medicine.

By imposing the Chiefs’ Covid Vaccination Order against Claimants, LAFD and the Chiefs blatantly ignore Claimants’ rights under H&S Code §24172 and §24175.

Claimants are therefore entitled to an award of damages against LAFD and the Chiefs, jointly, under H&S Code §24176.

(e) *Date, Place and Other Circumstances of the Occurrences Which Gave Rise to the Claims:*

The Chiefs' Covid Vaccination Order, described above, has been circulated by LAFD and the Chiefs through all battalions and stations since at least September 23, 2021. This violation of rights has been so ubiquitous that City investigators can confirm Claimants' assertions by simply interviewing Chief Terrazas, Chief Lesinski, Chief Alvarado and Chief Ferrari. If specific instances of conduct are required following the City's interviews with the above persons, Claimants will provide such information.

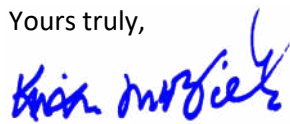
(f) *Amount of Each Claim:*

The amount of each claim against LAFD, Chief Terrazas, Chief Lesinski, Chief Ferrari and Chief Alvarado, jointly, is \$2,500,000 per Claimant.² The claims will be filed in Superior Court as an unlimited civil case pursuant to California Code of Civil Procedure.

(g) *Notice of Pending Litigation:*

Please also take notice that an action for declaratory and injunctive by these Claimants against the City is currently pending in Los Angeles Superior Court, Central Division, Case No. 21 STCV34490, Dept. 19, Honorable Stephanie Bowick presiding. Claimants intend to amend this action to include the damages claimed in this Notice of Claims and Intent to Sue.

Yours truly,



KEVIN McBRIDE

Attorney for 871 Claimants Listed on Appendix A

² NOTE: the amount of each claim *is* included here, notwithstanding Govt. Code §910, because the Los Angeles City online claim intake form specifically instructs to include the actual dollar amount of a claim.

APPENDIX A

CLAIMANT	CITY CLAIM #
Fabela, David	
Knox, John	
Tanguay, Richard	
Zizi, Mark	
Burmeister, Jeffrey	
Maurer, Timothy	
Lee, Matthew	
Muus, Mark	
Samama, Marc	
Cunningham, Michael	
Bailey, Brian	
Abeyta, Louie	
Acedo, Nicholas	
Acevedo, Erik	
Acevedo, Francisco	
Aceves, Matthew	
Ackley, Daniel	
Adair, Derek	
Aguayo, Timothy	
Aguilar, Victor	
Aguirre, Frank	
Ainilian, Timothy	
Albert, Jack	
Aldana, Salvador	
Alecio Sr, Julio Cesar	
Alexander, David	
Alva, Matthew	
Alvarez, Julio	
Amaya, Edwin	
Amin, Cherif	
Anderson, Blayne	
Anderson, Cliff	
Anderson, Jacob	
Anderson, Matthew	
Anderson, Sean	
Andrews, Ryan	
Angel, John	
Arevalo, Jorge	
Argumosa, Brian	

CLAIMANT	CITY CLAIM #
Armentrout, Nicholas	
Arnado, Anthony	
Arnold, Benjamin	
Ashburn, Jeffrey	
Austin, Jerry	
Avila, Nicolas	
Bachman, Evan	
Baker, Andrew	
Baker, Bryce	
Baker, Timothy	
Ball, Brandon	
Bandy, Larry	
Bannan, Joseph	
Barassi, Antonio	
Barkley, Edward	
Barlow, Desmond	
Barraza, Fernando	
Barrera, William	
Barrett, Steve	
Bashara, Thomas	
Bauman, Christopher	
Bebek, Brittney	
Beck, Jesse	
Belknap, Barry	
Bellendir, Jeremie	
Benavente, Stephen	
Bender, David A	
Bennett, Dean	
Benoit, Rashad	
Beverly, Sheldon	
Birg, Jeffrey	
Birnbaum, Nicholas	
Birondo, Jason	
Bishop, Yandell	
Black, Shin	
Black, Terry	
Blake, Jeffrey	
Bochey, Michael	
Boenzi, John	
Bojorquez, Joey	
Bonafede, Matthew	
Bond, Jack	

CLAIMANT	CITY CLAIM #
Booker, Anthony R.	
Bos, Jonathan	
Bowden, Brock	
Bowden, David	
Boyd, Barry	
Boyd, Brian	
Bradford, Emily	
Bradley, Morgan	
Braff, Jeffrey	
Brien, David	
Brink, Kenneth	
Brinnon, Joshua	
Briscoe, Nolan	
Brockschmidt, Edward	
Brooks, Bryan	
Brooks, Evan	
Brower, Kenneth	
Brown, Gregory	
Brown, Hannah	
Brown, Vincent	
Brownell, Aaron	
Bugarin, Eloy	
Bunn, Jason	
Burlingame, Ethan	
Burton, Josh	
Bustos, Chris	
Butts, Ryan	
Byrne, David	
Byrne, Leo	
Bystrom, Shane	
Cabunoc, Scott	
Camarlinghi, Rocky	
Campana, Michael	
Campanella, Philip	
Campos, Scott	
Campuzano, Ray	
Canata, Anthony	
Cannistraci, Dustin	
Cannon, Gregory-Michael	
Carbajal, Jesus	
Cardenas, John	

CLAIMANT	CITY CLAIM #
Carlis, Kameron	
Carlson, Travis	
Carmona, Benjamin	
Caro, Brandon	
Caro, Michael	
Carpenter, Caroline	
Carr, Brian	
Carranza, Armando	
Carrera, Omar	
Carter, Andrew	
Carter, Matthew	
Carter, Scott	
Cartier, Bret	
Catalano, Michael	
Cates, Daniel	
Cativo, Carlos	
Cavataio, Ron	
Cawdrey, Kyle	
Cendejas, Jonathan	
Cervantes, Chipper	
Cervantes, Richard	
Chamberlain, Thomas	
Chattong, Charles	
Chavez, Carlos	
Chavez, Daniel	
Chavez, Martin	
Cherry, Beau	
Chitiea, Adam	
Chitwood, Jeremy	
Clark, Braxton	
Clark, Kameron	
Clarke, Silas	
Cleary, Coalter	
Clements, Loren	
Cloud, Patrik	
Coates, Douglas	
Colbert, Daniel	
Coleman, Chase	
Colfax, Doug	
Collins, Bronson	
Collins, Nicholas	
Collyer, William	

CLAIMANT	CITY CLAIM #
Combes, Nate	
Comer, Dean	
Contreras, David	
Contreras, Jesse	
Cook, Darin	
Cook, Derek	
Cook, Gavin	
Cooney, Brian	
Cooper, Ian	
Cooper, Jared	
Cooper, Randolph	
Corby, Shaun	
Corcoran, Kelly	
Cordero, Nathan	
Corley, Garrett	
Cornassel, Brian	
Corral, Kurt	
Coughlin, Zachary	
Cremins, Todd	
Cress, Cameron	
Cresta, Anthony	
Crouthamel, Chad	
Crutchfield, Dana	
Cubak, Chace	
Cuervo, Abraham	
Cunningham, Michael	
Curtis, Chris	
Curtis, Ryan	
Czubek, James	
D'arrigo, Patrick	
Dahl, Derek	
Darcy, Nicholas	
Davis, Matthew	
Davla, Victor	
Dayen, Blake	
De La Torre, Roman	
Degeeter, Dennis	
Degele, Charles	
Deierling, Matthew	
Demott, Mark	
Dennis, Mike	
Diaz, Armando	

CLAIMANT	CITY CLAIM #
Dickinson, Steve	
Diede, Rich	
Diem, Ryan	
Dillenberger, Donald	
Divalerio, Christopher	
Dominguez, Carlos	
Downey, Thomas	
Duda, Zachary	
Duke, Paul	
Dupertuis, Christopher	
Duran, David	
Dyer, Randy	
Easom, William	
Easton, Kevin	
Eccles, Jake	
Eddy, Matt	
Edwards, Cody	
Egizi, Kevin	
Egizi, Mark	
Ekblad, Matthew	
Elmore, Tyler	
Erazo, Chris	
Escamilla, Monica	
Escorcia Sr., Alex	
Esparza, Sinoeh	
Estrada, Diego	
Estrada, Mark	
Evans, Bill	
Farris, Brian	
Farris, Matthew	
Faulkner, Curtis	
Fenton, Lane	
Fenzke, Cary	
Ferralli, Timothy	
Ferrari, Chuck	
Ferrari, Daniel	
Ferro, Anthony	
Field, Joseph	
Figueroa Jr, Arthur	
Filippelli, Stefano	
Finch, Stephen	

CLAIMANT	CITY CLAIM #
Finger, Paul	
Fischer, William	
Fisher, Adam	
Fisher, Eric	
Fitzgerald, Jeff	
Flores, John	
Foor, Timothy	
Foote, Daniel	
Ford, Ephfriam	
Fortune, Daniel	
Foster, Jason	
Foster, Jeffrey	
Foster, Shawn	
Foster, Vincent	
Fowler, Jonathan	
Frere, Brandon	
Frye, Johnny	
Fryer, Jacob	
Fuette, Ryan	
Gadia, Presyller	
Gales, Devin	
Galvez, Aaron	
Galvez, Gregory	
Gammon, Jordan	
Gapuzan, Felix-Edmund	
Garcia, Daniel	
Garcia, Eric	
Garcia, Keith	
Garibay, Stephen	
Garrett, Grant	
Gasbarri, Henry	
Gaspar, Cade	
Gastelum, David	
Gates, Dustin	
Gaul, Randall	
Gelinas, Kevin	
Generoso, Mario	
Gentry, Christopher	
Gibboney, Chris	
Gikas, Thomas	
Gilchrist, Mark	

CLAIMANT	CITY CLAIM #
Gill, Shawn	
Gillissie, Michael	
Girard-Manzo, Susan	
Gladinus, Kent	
Glenchur, Mark	
Gocke, Andrew	
Goetze, James	
Gomez, Glen	
Gomez, Pablo	
Gomez, Raul	
Gomez, Ulysses	
Gonzales, Alex	
Gonzalez, Eric	
Gonzalez, Jacob	
Gonzalez, Jacob	
Gonzalez, Ruben	
Gonzalez, Steven	
Gorrie, Brett	
Gorski, Justen	
Goshorn, John	
Goudeau, Jean-Paul	
Gragas, Aaron	
Granucci, Cristian	
Gravitt, Todd	
Greer, Christi	
Gregory, Haden	
Griffith, Thomas	
Grigsby, Chelsey	
Grindle, Bayne	
Gudiel, Borys	
Gutierrez, Rudy	
Guzman, Michael	
Guzman, Sergio	
Hadley, Ryan	
Hajjar, Austin	
Hall, James	
Halstead, Kyle	
Halversen, Joshua	
Hamilton, Jeffrey Bryan	
Hamilton, Scott	
Hammock, Jeremy	

CLAIMANT	CITY CLAIM #
Hamson, Timothy	
Han, Daniel	
Harris, Scott	
Hart, Christopher	
Hass, Cody	
Hatfield, Robert	
Hauck, Andrew	
Hayes, Michael	
Haynes, Shihida	
Hazard, Stephen	
Heagy, Derek	
Heald, Jamie	
Healey, Brooke	
Heffner, Zane	
Helton, Nathan	
Henry, Thomas	
Hernandez, Anthony	
Hernandez, Francisco	
Hernandez, Kyle	
Hernandez, Riobec	
Hessing, Scott	
Hiatt, Jeffrey	
Hill, Celeste	
Hill, Jason	
Hill, Travis	
Hinton, Steven	
Hiserman, Stephen	
Hisgen, Connor	
Hix, Harold	
Hobbs, Scott	
Hoehn, Jesse	
Hoki, Gary	
Holland, Cameron	
Holland, James	
Hong, Dennis	
Honles, Javier	
Hoogsteen, Jordan	
Hook, Rex	
Hoon, Gregory	
Hoppe, Dylan	
Horine, Jacob	
Horst, Christopher	

CLAIMANT	CITY CLAIM #
Hugo, Al	
Hunter, Kenneth	
Hutchinson, Tanner	
Ibanez, Brad	
Ibarra, Domenic	
Ibrahim, Brandon	
Ilyaich, Denis	
Ingham, Jeremy	
Jackson, Jessica	
Jackson, Matthew	
Jackson, Robert	
Jackson, William	
Jaime, Refugio	
Jaminal, Adelino	
Janzen, Allen	
Jefferis, Dean	
Jejoni, Hani Peter	
Jeremica, Paul	
Jimenez, Daniel	
Jimenez, John	
Jimenez, Pedro	
Johnson, Grady	
Johnson, Mike	
Johnson, Ryan	
Jones, Brian	
Jones, Joshua	
Jones, Leon	
Jones, Michael	
Kabey, Curtis	
Kama, Garan	
Kang, Eugene	
Kearns, Brett	
Keay, Robert	
Keeler, Tanner	
Keener, Jason	
Kellers, John	
Kelley, Shawn	
Kelly, Andrew	
Kelly, Charles	
Kennedy, Sean	
Kennison, Korey	
Kerr, William	

CLAIMANT	CITY CLAIM #
Kilpatrick, Robert	
Kim, Lawrence	
King, Aaron	
King, Darren	
Kiss, Joshua	
Kitratnee, Patrick	
Kneisler, Brent	
Kobe, Nicholas	
Kobylka, Jared	
Kokinski, Ray	
Kratkin, Glen	
Krebs, James	
Kriewall, Alex	
Kroner, Brandon	
Krylo, Joshua	
Kunath, Cooper	
Kuripla, Jonathan	
Kusar, Jason	
Kush, Daniel	
Kuzichev, Alfred	
Kuzmicz, Christopher	
Kwasigroch, Scott	
Lacina, Caleb	
Ladue, Michael	
Laier (Lafd), Darin	
Lake, David	
Lambert, Andrew	
Landis, Jenifer	
Larez, Frank	
Largen, Nathan	
Lavalle, Christopher	
Lawrence, Jason	
Lazar, Scott	
Leamy, Denver	
Leddy, Daniel	
Lee, Daniel	
Leidholdt, Troy	
Lemmond, David	
Lemus, Alexander	
Leon, Michael	
Libby, John	
Liberto, Daniel	

CLAIMANT	CITY CLAIM #
Limon, Carlos	
Lins, Jake	
Logan, Chad	
Longan, Jon	
Lopez, Gabriel	
Loveless, Scott	
Lowe, Kevin	
Lozano, Albert	
Lucas, David	
Luft, Scott	
Ly, Chao	
MacDowell, Michael	
Mack, David	
MacLearn, Jeremiah	
Magana, Felix	
Makovy, Alexander	
Maloney, Brennan	
Malray, Christopher	
Mammone, Matthew	
Mancillas, Eduardo	
Mandahl, Michael	
Mann, Aaron	
Manzo, Christopher	
Manzo, Joe	
Manzo, Salvador	
Mark, Perine	
Marotta, Steven	
Marquez, Joshua	
Martin, Timothy	
Martineau, Stephen	
Martinez, Eric	
Martinez, Kenneth	
Marx, Greg	
Mass, Jason	
Mata, Raul	
Matamoros, Eddie	
Matillo, Eric	
Mattei, John	
Mattei, Justin	
Matthews, Blakeley	
Mattison, Mikel	
Mattson, Brandon	

CLAIMANT	CITY CLAIM #
May, James	
McCord, John	
McGrady, Michael	
McLaren, Devin	
McLaren, Nicholas	
McLaren, Weston	
McMahon, Michael	
McMillan, Michael	
Medina, Bryan	
Medrano, Robert	
Mejia, Geovanny	
Mena, Vince	
Mendieta, Giselle	
Mendo, Gabriela	
Mendoza, Joe	
Mercer, Joshua	
Meza, Miguel	
Miller, Brian	
Miller, Chad	
Miller, Mark	
Miller, Nicholas	
Millman, Micah	
Mills, Peter	
Milroy, Luis	
Miramontes, Chris	
Miranda Lopez, Jorge	
Mitchell, Taana	
Miyasato, Christian	
Molina, Ricardo	
Molinar, Andrew	
Monroy, Matthew	
Monroy, Sean	
Montez, Eddie	
Montoya, Joe	
Moon, Matthew	
Moore, Clinton	
Moore, Daejon	
Moore, Ian	
Morehouse, Josh	
Morgan, Justin	
Morlock, James	
Mott, Andrew	

CLAIMANT	CITY CLAIM #
Mount, Richard	
Moya, Jose	
Mueller, Michael	
Muro, Peter	
Murphy, Zachary	
Murrell, Jacob	
Nagy, Zoltan	
Narvaez, David	
Navarro, Elber	
Navarro, Leonardo	
Nelson, Shane	
Nevarez, Eric	
Nevins, William	
Newberry, Lawrence	
Newon, Bryan	
Ngo, John	
Nguyen, Tony	
Nieves, Adrian	
Nordquist, James	
Nordquist, Thomas	
Nunez, Matthew	
Nunez, Timothy	
Nuno-Ordonez, David	
Nyberg, Thomas	
Oberto, Thomas	
Obryan, Corey	
Ochoa, Jeffery	
Ochoa, Luis	
Ochoa, Luis	
Okula, Matthew	
Olmedo, Gabriel	
Ornelas, John	
Ornelas, Joshua	
Orozco, Jesus	
Ortiz, Jason	
Ortiz, Stephen	
Ortiz, Tony	
Padilla, Gustavo	
Padilla, Jesus	
Paez, Robert	
Pagliuso, Michael	
Park, Ban	

CLAIMANT	CITY CLAIM #
Pashabezyan, Makar	
Passmore, Russ	
Paulin, David	
Peck, Alan	
Pedini, Christian	
Pennington li, Stephen	
Pennington, Corey	
Penrod, Ryan	
Peralta, Rene C	
Perelli-Minetti, Joshua	
Perez, Eduardo	
Perez, Jason	
Perez, Jose L	
Peterman, Luke	
Peterson, Keri	
Petrich, Bryan	
Phillips, Shawn A	
Phillips, Shawn W	
Pido, Timothy	
Pike, Scott	
Pohl, Christopher	
Polgar, Christopher	
Poole, Leslie	
Porter, Matthew	
Portis, Marcus	
Potter, Matthew	
Poulson, Craig	
Powell, Jason	
Prange, Nicholas	
Prian, Sean	
Prichard, Coleman	
Prichard, Kory	
Pritchett, Kevin	
Prusa, Ryan	
Pudwill, Jake	
Puels, Richard	
Purrington, Jordan	
Pytell, Jefferson	
Quach, Warren	
Quan, Stanley	
Quealy, Matthew	

CLAIMANT	CITY CLAIM #
Quick, Bryan	
Quintero, Carlos	
Ramelli, Joel	
Ramirez, Daniel	
Ramirez, Ethan	
Ramirez, Kevin	
Ramsey, David	
Randolph, Chris	
Rankell, Nik	
Raphael, Harold	
Rappaport, Taylor	
Rieger, Michael	
Reilly, Jason	
Reitmayer, Michael	
Reyes, Benjamin	
Reyes, Dario	
Reynolds, Zach	
Rice, Travis	
Richards (Morda), Nicolette	
Richardson, Chad	
Riddle, Austin	
Riggs, Thomas	
Riles, David	
Rindge, Thomas	
Rivera, Carlos J	
Rivera, Javier	
Rivera, Kristina	
Roach, Craig	
Roarty, Tim	
Robbins, Blake	
Roberts, David	
Roberts, Eric	
Robinson, Christopher	
Rocha, Rudy	
Rochman, Matthew	
Rodriguez, Corey	
Rodriguez, Daniel	
Rodriguez, Isaac	
Rodriguez, Jeffery	
Rodriguez, Nestor	
Rodriguez, Ray	

CLAIMANT	CITY CLAIM #
Rodriguez, Stephen	
Roe, John	
Roman, Daniel	
Romero, George	
Romero, Johnny	
Romero, Ryan	
Romo, Matthew	
Rondinella, Dawn	
Rondinella, Robert	
Ros, Alberto	
Rosas, Anthony	
Rose, Nicholas	
Ross, Jordan	
Rossello, Marc	
Roupoli, Aaron	
Rubic, Caesar	
Russell, Luke	
Ryan, Brandon	
Ryan, Philip	
Sacramone, Brian	
Saenz li, Andres	
Saez, Jebediah	
Salas, Jose	
Salas, Larry	
Salley, Bret	
Sanchez, Jesus	
Sanders, Ryan	
Sandoval, Daniel	
Sandoval, Michael	
Sankey, Dwight	
Sansone, Dustin	
Santa Maria, Joe	
Sasso, Paolo	
Saure, Kyle	
Scachetti, Marco	
Scantlebury, Eddie	
Schaller, Steve	
Scheiern, Aaron	
Schmitz, Jason	
Schroeder, Wes	
Schuetz, Wayne	
Scott, Rob	

CLAIMANT	CITY CLAIM #
Seers, Michael	
Serpa, Alvin	
Shaffer, Andrew	
Shaw, Robert	
Shickle, Jason	
Sibayan, Nick	
Silvas, Carley	
Singelakis, Julian	
Sissac Jr, Martin	
Smith, Andrew	
Smith, Austin	
Smith, Brian	
Smith, Dale	
Smith, Joel	
Smith, Jonathon	
Smith, Joshua	
Smith, Martese	
Snyder, Zachary	
Sokolowski, Jacob	
Soriano, Ian	
Sossaman, Randall	
Soto, Mark	
Spencer, Christopher	
Spreeman, Donald	
Spriggs, Stephen	
Spring, Jeremiah	
Springer, Seth	
Stabel, Kurt	
Stadden, Jeffrey	
Stalie, Daniel	
Stanford, Jamie	
Stasiefski, Steven	
Steele, Bradley	
Steele, Jeffrey	
Steiger, Brent	
Steiger, Eric	
Steiner, Joseph	
Steinman, David	
Steinman, Don	
Stephens, Brent	
Stephenson, Mike	
Sterkel, Joey	

CLAIMANT	CITY CLAIM #
Sternick, Shawn	
Stilson, Ladd	
Stine, Christopher	
Stoffel, Robert	
Stonebraker, Gregory	
Strauss, Branden	
Stromsoe, Jonathon	
Studenka, Craig	
Stuhlman, John	
Stump, David	
Sullivan, Daniel	
Sullivan, John	
Sullivan, Jonathan	
Sumner, Joshua	
Susca, Daniel	
Sutton, Warren	
Svorinich, Martin	
Taggart, Kelly	
Tagliere, Peter	
Tamayo, Jason	
Tamrazian, Patrick	
Tapia, Brent	
Tapia, Robert	
Tarango, Ian	
Taulli, Brandon	
Taylor, Michael	
Terrazas, Brandon	
Teter, Jason	
Teter, Jedidiah	
Theodore, Johnathan	
Thibault, Corey	
Thiebold, Brian	
Thompson, Eric	
Thompson, Richard	
Thyfault, Christopher's	
Tinoco, Eriberto	
Toapanta, Diego	
Tobon, Gilbert	
Togneri, Michael	
Tomlin, Kelly	
Tomlin, Scott	

CLAIMANT	CITY CLAIM #
Toomey, Channing	
Torres, Adrian	
Trevino, Robert	
Trinidad, Douglas	
Troya, Tyler	
Trtryan, Manvel	
Trujillo, Mario	
Tsarofski, Dimitrius J	
Tsarofski, Jonathan	
Tuzzolino, Terry	
Tye, Nicholas	
Tyler, Mikayla	
Urias, Marco	
Urrea, Gilbert	
Valadez, Daniel	
Valdez, Travis	
Vallejos, Timothy	
Valles, Ray	
Van Blarcom, Nick	
Van Hoesen, John	
Vandergeest, Mackenzie	
Vardanian, Alanah	
Vardanian, Bryan	
Vargas, Alberto	
Vasquez, Fernando	
Vavrin, Michael	
Vera, Carlos	
Verdecia, Anthony	
Verwey, Eric	
Vidor, Emerson	
Vigil, Joseph	
Vigliotta, Richard	
Villata, Michael	
Viray, Madison	
Vlahos, Daniel	
Voelker, Andre	
Vonderharr, Nathan	
Vriens, Jason	
Wagoner, Mark	
Waldrep, Adin	
Walker, Derek	

CLAIMANT	CITY CLAIM #
Ward, Dennis	
Ward, Derrick	
Ward, Robert	
Warner, John	
Watkins, Nicholas	
Webb, Michael	
Webb, Ryan	
Wedlock, Robert	
Wehunt, Christopher	
Weideman, August	
Weisweaver, Howard	
Weng, Thomas	
Werle, Tim	
Western, Trent	
Westmoreland, Matthew	
Westphal, Mario	
White, Steven	
Whitmore, Greg	
Whitsell, Devin	
Wile, Brandon	
Wilkinson, Patrick	
Willahan, Kenneth	
Williams, Keith	
Williams, Steven	
Williamson, James	
Williamson, Kevin	
Willis, Bryan	
Willis, Kevin	
Wilmarth, Nathan	
Wise, Scott	
Wong, Alexander	
Wong, Bennett	
Wong, Jonathan	
Woodcox, Alexander	
Worley, Cory	
Yakas, Peter	
Yoshimura, Westley	
Zagorac, Ljubomir	
Ziemer, Stephen	
Zins, Scott	
Zuniga, Carlos	
Hurtado, Francisco	